

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

YADIRA CONTRERAS, ERICA
KRONECK, KYLE OLSON, AND
HENDRY (“CODY”) RODMAN III,

Plaintiffs,

vs.

HERITAGE UNIVERSITY,

Defendant.

Case No.: 22-cv-03034 TOR

DECLARATION OF IAN AHRENS
IN SUPPORT OF PLAINTIFFS’
MOTION IN LIMINE NO. 4

I, Ian Ahrens, am over the age of eighteen years, am competent to testify, and
declare that the following statements are based on my personal knowledge and true
under the penalty of perjury under the laws of the State of Washington:

1. I was a student enrolled in Cohort 6 of the Physicians Assistant (“PA”) program at Heritage University from 2020 - 2021.

1 2. I currently live in Nebraska and would like to voluntarily testify at the
2 upcoming trial in this matter regarding my enrollment in and personal experiences
3 with Heritage University's PA program. However, in order to testify, I would need
4 to do so remotely.
5

6 3. I live in Nebraska with my wife and two small children (ages 15 months
7 and 3 years). My wife, Ashley, is currently 20 weeks pregnant. She has a history of
8 gestational hypertension and preterm labor. Given these medical conditions, I have
9 genuine concerns about leaving her for a multiple-day trip to Yakima to testify in
10 person.
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14 I declare this 29 day of April 2025 in Chadron, Nebraska that the foregoing
15 is true under penalty of perjury.

16 

17 _____
18 Ian Ahrens
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Audit trail

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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing document on the following party:

Paul J. Triesch
Keating Bucklin & McCormack, Inc., P.S.
801 2nd Avenue, Suite 1210
Seattle, WA 98104
ptriesch@kbmlawyers.com
Attorney for Heritage University

by electronic mail to said parties on the date shown below.

Dated this 29th day of April 2024.

s/ Sydney Arizona Bay
Sydney A. Bay